

**BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001**

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

**POSTAL RATE AND FEE CHANGES, 2000**

**Docket No. R2000-1**

**INTERROGATORIES OF  
ASSOCIATION FOR POSTAL COMMERCE  
TO USPS WITNESS MOELLER  
(PostCom/USPS-T-35-2-3)**

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories to USPS witness Moeller PostCom/USPS-T-35-2-3. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



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PostCom/USPS-T-35-2. Please refer to footnote 4 in LR-I-166, wp1\_comm.xls, worksheet "parcel," which states, "Estimate of reduction in surchargable pieces due to implementation of the surcharge."

(a) Please confirm that the "Estimate of reduction in surchargable pieces due to implementation of the surcharge" is 25% for Standard (A) Regular. If not confirmed, please provide the correct figure.

(b) Please explain how this 25% figure was developed.

(c) Do the pieces that are no longer surchargable leave the Standard (A) Regular mailstream? If so, please provide a citation to where the Postal Service has adjusted Standard (A) Regular cost and volume figures to reflect this change.

(d) Do the pieces that are no longer surchargable become flat-shaped Standard (A) Regular pieces? If so, please provide a citation to where the Postal Service has adjusted Standard (A) Regular cost figures to reflect this change.

(e) If your response to part (c) was no, please describe which test year mailstream includes these no longer surchargable pieces.

PostCom/USPS-T-35-3. Please refer to footnote 9 in LR-I-166, wp1\_comm.xls, worksheet "parcel," which states, "Estimate of reduction in surchargable pieces due to implementation of the surcharge."

(a) Please confirm that the "Estimate of reduction in surchargable pieces due to implementation of the surcharge" is 50% for Standard (A) ECR. If not confirmed, please provide the correct figure.

(b) Please explain how this 50% figure was developed.

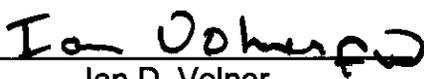
(c) Do the pieces that are no longer surchargable pieces leave the Standard (A) ECR mailstream? If so, please provide a citation to where the Postal Service has adjusted Standard (A) ECR cost and volume figures to reflect this change?

(d) Do the pieces that are no longer surchargable pieces become flat-shaped Standard (A) ECR pieces? If so, please provide a citation to where the Postal Service has adjusted Standard (A) ECR cost figures to reflect this change.

(e) If your response to parts (c) was no, please describe which test year mailstream includes these no longer surchargable pieces.

## CERTIFICATION

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding having requested service of discovery documents in accordance with Section 12 of the rules of practice.

  
Ian D. Volner